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June 18, 2024

VIA CM/ECF

The Honorable Rukhsanah L. Singh, U.S.M.J.
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street, Room 7W
Trenton, NJ 08608

Re: New Jersey Chinese Comm. Ctr. v. McAleer, et al.
Civil Action No. 3:21-cv-08320

Dear Judge Singh:

This office represents Defendant Peter McAleer in the above-captioned matter. I am writing to request an adjournment of the status conference scheduled for Friday June 21 as well as a seven-day extension of time to respond to Plaintiff's Amended Complaint.

First, counsel requests an adjournment of the status conference as the State of New Jersey celebrates the Juneteenth holiday on Friday, June 21, 2024. The New Jersey Attorney General's Office is closed and I will be unavailable on that date.

Second, for the reasons which follow, I am requesting an additional seven days to respond to Plaintiff's amended complaint, on or before July 1, 2024.

On June 4, the Court granted Co-Defendant Newsmatic's Motion for Leave to Amend to add a counter-claim against Plaintiff, and Plaintiff's Cross-Motion for Leave to Amend to add a new claim against Newsmatics. ECF No. 105. On June 5, undersigned counsel filed a substitution of attorney, removing DAG Angela Cifelli. ECF NO. 106. As of that date, the parties' motions for summary judgment had been fully briefed. See ECF Nos. 96, 99, 100. On June 10



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Plaintiff filed an Amended Complaint. ECF NO. 107. However, in addition to stating the proposed new claim against Newsmatics, Plaintiff also added a new claim against my client, Defendant Peter McAleer.

Pursuant to Fed. R. Civ. P. 15(a)(3), any required response to an amended pleading must be made within 14 days after service of the amended pleading. I request an additional seven days to respond to the amended pleading as I am still new to the case and have been collecting information regarding this litigation. I respectfully request to file a responsive pleading to Plaintiff's Amended complaint by July 1. Counsel for Newsmatics has provided their consent. Counsel for Plaintiff has advised she does not consent to this request.

We thank the court in advance for its consideration in this matter.

Respectfully,

MATTHEW J. PLATKIN
ATTORNEY GENERAL OF NEW JERSEY

By: s/Dana L. Paolillo
Dana L. Paolillo
Deputy Attorney General

cc: Cynthia Hwang, Esq. (via ECF/CM)
Vincent Verdiramo, Esq. (via ECF/CM)
Walter E. Steimel, Jr., Esq.

For good cause shown, the conference call scheduled for June 21, 2024 is hereby ADJOURNED to June 27, 2024. Counsel for Plaintiff shall initiate the call at 11:30am. Counsel for Defendant Peter McAleer to file his response to the Amended Complaint is hereby extended to July 1, 2024.

So Ordered this 20th day
of June, 2024

RJS/JL
Hon. Rukhsanah L. Singh, U.S.M.J.